Reconsideration and allowance of the above-identified application are

respectfully requested. Claims 5, 9, 13 and 15 are amended herein. Upon entry of this

Amendment, claims 1-15 will be pending.

In the office action, the Examiner objected to the drawings, and more

specifically, requested that the "target part" referred to in claims 11 and 15 be shown

in the drawings. Applicants have amended the specification to clarify that the target

part is steel plate 9 shown clearly in, for example, FIGS. 1 and 18. Accordingly, the

objection to the drawings is believed to be overcome, since the feature is shown in the

drawings.

The Examiner objected to claim 5, because single square brackets were used to

delete the term "to 4". Applicants have amended claim 5 to delete the term "to 4"

using double square brackets, and assume that the remaining amendments to claim 5

presented in the preliminary amendment filed July 28, 2006 were entered.

The Examiner also objected to claims 9 and 13 because the term "hold" should

have been "hole." Applicants have amended claims 9 and 13 herein to replace the

word "hold" with "hole." Accordingly, the objection is believed to be overcome.

The Examiner rejected claims 11 and 15 under 35 U.S.C. §112(2) as being

indefinite for failing to particularly point out and distinctly claim the subject matter

which applicant regards as the invention. More specifically, the Examiner alleged that

there was insufficient antecedent basis for the limitation "the target part" in line 5 of

claims 11 and 15. Claims 11 and 15 have been amended to replace "the target part"

-7-

with "a target part." This, in connection with the clarifying amendment to the

specification discussed above, overcomes the rejection.

The Examiner rejected claim 15 because the limitations "the feeding rod," "the

fixed electrode or the movable electrode," "the welding device," and "the part" lacked

antecedent basis. Applicants have amended claim 15 to correct the antecedent basis

problems by amending the terms to "a feeding rod," "a fixed electrode or a movable

electrode," "a welding device," and "a part." Accordingly, the rejection is overcome.

Turning to the substantive rejections, the Examiner rejected claims 1-4 and 6

as being anticipated by U.S. Published Patent Application No. 2003/0127432 to

Aoyama et al. (hereinafter 'Aoyama '432'). Applicants traverse the rejection since

Aoyama fails to teach or suggest each of the limitations of at least independent claim

1. Claim 1 recites a movable electrode and a part feeding device that are integrated

through a coupling member, so that an end position of the feeding rod moved forward

and an end portion of the movable electrode or the fixed electrode are in a

predetermined relative positional relation. An exemplary coupling member is shown,

for example, in FIG. 1 at 79. The welding device 66, which includes movable

electrode 6, is connected to stationary pole 72 via support arm 73. Part feeding device

82 is not connected directly to the pole 72, but rather is *integrated* with the welding

device 66 via coupling member 79. As a result of the coupling, the relative position of

the movable electrode and the part feeding device are set with respect to one another.

By contrast, the welding device shown and described in Aoyama '432 does not

teach or describe a coupling member such as coupling member 79 shown in FIG. 1 of

the present application. Rather, the welding device and part feeding device of Aoyama

-8-

App. Ser. No. 10/587,540

'432 are separately attached to pillar 7 (see, e.g., FIGS. 1 and 2). The welding device

is attached to pillar 7 via support arm 8, and the part feeding device is attached to

pillar 7 via a bracket 15 (see, e.g., FIG. 8). Accordingly, the movable electrode and

part feeding devices of Aoyama '432 are not integrated through a coupling member.

As discussed in the background of the application, in conventional welding

devices in which the movable electrode and the part feeding device are not integrated

through a coupling member, it is necessary to precisely set the relative position

between an end position of the feeding rod of the part feeding device and the

predetermined position of the steel plate member or the like set on the welding

machine (See background, p.1). It is extremely difficult to set the foregoing relative

positions with fine adjustment at the site of a plant due to local limitations and the

like. Furthermore, the position of the part feeding device cannot be flexibly changed

in conventional devices, causing inconvenience to the user and limitations on the size

and shape of the steel plate member and the like.

According to embodiments of the present invention, the welding device and

the part feeding device are integrated through a coupling member, such as coupling

member 79 shown in FIG. 1. As a result, the relative position of the movable electrode

and the end position of the part feeding device are set precisely with respect to one

another. Further, and advantageously, the position of the welding device and part

feeding device can be moved to accommodate certain physical space limitations at the

plant, while maintaining the relative position of the movable electrode and the part

feeding device precisely.

-9-

By contrast, Aoyama '432 describes a welding device connected to a stationary member via connecteing means 8, 9, and a part feeding device separately connected to the stationary member via connecting means 15, 16, 17. Clearly, the welding device and part feeding device of Aoyama '432 are unable to be adjusted or rotated *together* with respect to the stationary member because they are not *integrated through a coupling member*. Since Aoyama '432 does not teach or suggest any structural feature which sets the relative position between welding device and part feeding device, as claimed in at least the above described limitations of claim 1 of the present application, the rejection must be withdrawn. Claims 2-4 and 6 depend from claim 1, and are therefore allowable for at least the same reasons.

The Examiner rejected claim 5 under 35 U.S.C. §103(a) as being obvious over Aoyama '432 in view of U.S. Patent No. 5,943,098 to Aoyama (hereinafter 'Aoyama '098'). The Examiner cites Aoyama '098 as teaching a plurality of part feeding devices each of which feeds a different type of part are attached to the coupling member or an auxiliary member integrated with the coupling member. Applicants traverse the rejection. Aoyama '098 merely teaches different types of part feeding devices, but does not teach a plurality of part feeding devices attached to a coupling member. Furthermore, Aoyama '098 fails to make up for the deficiencies discussed above with respect to Aoyama '432. That is, neither Aoyama '432 nor Aoyama '098 teach or suggest a movable electrode and a part feeding device integrated through a coupling member. Accordingly, the rejection of claim 5 must be withdrawn.

Claim 7 is rejected by the Examiner as being obvious over Aoyama '432 in view of Applicants Admitted Prior Art (AAPA). As discussed above, regardless of

App. Ser. No. 10/587,540

what is taught in the AAPA, Aoyama '432 fails to teach or suggest a movable

electrode and a part feeding device intergrated through a coupling member, as recited

in claim 1, from which claim 7 depends. Accordingly, the rejection must be

withdrawn.

The Examiner rejects claims 8-12 and 15 as being unpatentable over Aoyama

'432 in view of U.S. Patent No. 5,396,842 to Quinci et al. Claims 8-11 are allowable

at least by virtue of their dependence on claim 1 as discussed above. Applicants

respectfully traverse the rejection of claim 12. Claim 12 recites an auxiliary clamp

block for setting a moving distance of a support rod in advance, disposed over or

under a clamp block. The Examiner cites Quinci as teaching this feature. However,

Quinci fails to teach both a clamp block and an auxiliary clamp block. Part 24 in FIG.

8 is the only clamping block taught or suggested by Quinci. As described and claimed

in the present application, embodiments of the present invention comprise both a

clamp block and an auxiliary clamp block. In this manner, and as a result, the

auxiliary block of embodiments of the present invention can be loosened and moved

by a predetermined distance while the main clamp block remains tightened. Then the

auxiliary block can be tightened after being moved the predetermined distance. Then,

as a result of the auxiliary block being moved the predetermined distance and

tightened, the main clamp block can be loosened and the clamp block can safely and

easily be moved the predetermined distance into contact with the tightened auxiliary

clamp block. Finally, the clamp block can be tightened after moving the desired

predetermined distance, as determined by the moved auxiliary clamp block. Quinci

fails to teach or suggest even the two clamping blocks of embodiments of the present

-11-

Amdt. filed April 14, 2009

Responding to office action mailed January 22, 2009

App. Ser. No. 10/587,540

invention. As a result, Quinci fails to teach or suggest each of the limitations of

independent claim 12. Claims 13-15 depends from claim 12, and accordingly is

allowable for at least the same reason as claim 12. The Examiner's rejection having

been shown to be insufficient, Applicants kindly request reconsideration.

-12-

Amdt. filed April 14, 2009 Responding to office action mailed January 22, 2009 App. Ser. No. 10/587,540

In view of the above, it is believed that the application is in condition for allowance and notice to this effect is respectfully requested. Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the telephone number indicated below.

Respectfully Submitted,

Christian C. Michel Attorney for Applicant Reg. No. 46,300

Roylance, Abrams, Berdo & Goodman, L.L.P. 1300 19th Street, N.W., Suite 600

Washington, D.C. 20036

(202) 659-9076

Dated: 14, 2009